

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95823
Telephone: 916-498-5700
Fax: 916-498-5710

Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-000151-WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JOSE CURIEL,)	Judge: William B. Shubb
)	Date: March 11, 2024
Defendants.)	Time: 9:00 a.m.
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, and Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, that the status conference scheduled for March 11, 2024, be continued to **May 6, 2024, at 9:00 a.m.**

Defense counsel continues to review discovery and conduct investigation in this case. The parties anticipate an initial plea offer from the government prior to the next status conference, and will require additional time to review the offer with the defendants and respond to the government. The parties believe a continuance to May 6, 2024, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and finalize any further pre-plea negotiations.

1 The parties agree that the ends of justice served by resetting the status conference date
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).
4

5 Dated: March 6, 2024

Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Public Defender

8 /s/ Megan T. Hopkins
9 MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for Defendant
10 JOSE CURIEL

11 PHILLIP A. TALBERT
12 United States Attorney

13 Dated: March 6, 2024

/s/ Justin Lee
14 JUSTIN LEE
Assistant United States Attorney
Attorney for Plaintiff
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

IT IS HEREBY ORDERED that the status conference scheduled for March 11, 2024, at 9:00 a.m. is continued to **May 6, 2024, at 9:00 a.m.** The time period through May 6, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: March 7, 2024



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE